## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

## PERMITTEE

Quebecor World Direct - Wessel Division

Attn: Dominic Zambuto

1201 Kirk Street

Elk Grove Village, Illinois 60007-5863

Applicant's Designation: Date Received: April 17, 2001

Subject: Lithographic Printing Plant

Date Issued: August 13, 2001 Expiration Date: August 13, 2006

Location: 1201 Kirk Street, Elk Grove Village

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of five heatset web offset lithographic printing presses controlled by two afterburners and a waste paper collection system controlled by cyclone as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2. The lithographic printing presses are subject to the emission limitations and control requirements of 35 Ill. Adm. Code 218.407 and shall comply with the following requirements:
  - a. The total VOM content in the as-applied fountain solution is 1.6 percent or less, by volume, and the as-applied fountain solution contains no alcohol;
  - b. The air pressure in the dryer is maintained lower than the air pressure of the press room, such that air flow through all openings in the dryer, other than the exhaust, is into the dryer at all times when the printing line is operating;
  - c. An afterburner is installed and operated so that VOM emissions from the press dryer exhaust(s) are reduced by 90 percent, by weight;

- d. The afterburner is equipped with Illinois EPA and USEPA approved continuous monitor that measures the combustion chamber temperature. It shall be installed, calibrated, maintained, and operated in accordance with the manufacturer's specifications and shall have an accuracy of 3% or 5%. Monitoring shall be performed at all times when the afterburner is operating;
- e. Monitoring device is equipped with a continuous recorder of the temperature, such as a strip chart recorder or computer, with at least the same accuracy as the temperature monitor. It shall be installed, calibrated, operated and maintained, in accordance with manufacturer's specifications;
- f. The afterburner is operated at all times when at least one printing line associated with this afterburner is in operation.
- g. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20?C (68?F);
- h. The VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line are kept, stored or disposed of in any manner other than in closed containers.
- 3. The paper coating operations performed on the printing presses are subject to and shall comply with the volatile organic materials (VOM) emission limitations of 35 Ill. Adm. Code Part 218 Subpart F: Coating Operations. Compliance with the requirements of this subpart is achieved through the use of a capture system and control device that provides 81 percent reduction in the overall emissions of volatile organic materials (VOM) from the coating lines and a control device that provides a 90 percent efficiency pursuant to 35 Ill. Adm. Code 218.207(b)(1).
- 4. Operation and emissions of five heatset web offset lithographic printing presses (combined) shall not exceed the following limits:

<u>Material</u>	Materia (Ton/Mo)		Ave. VOM Content (Wt.%)	Capture Eff. (Wt.%)	Control Eff. (Wt.%)		issions (Ton/Yr)
Ink	51.0	510.0	40	100	98	650	3.3
FS Concentrate	2.5	24.0	18	70	98	280	1.4
Blanket Wash							
Automatic	1.8	17.5	28	40	98	690	3.0
Manual	1.7	17.0	100	_	_	1,700	8.5
Coatings							
Varnish	1.6	16.0	45	90	98	170	0.8
Scratch Off	2.1	20.4	28	90	98	140	0.7

		;	Ave. VOM	Capture	Control		
	Materia	al Usage	Content	Eff.	Eff.	VOM Em	issions
Material	(Ton/Mo	(Ton/Yr)	(Wt.%)	(Wt.%)	(Wt.%)	(Lb/Mo)	(Ton/Yr)
		_					
Adhesives							
Remoist	40.0	400.0	2	95	98	110	0.6
Finishing	8.8	87.5	2	_	_	350	1.8
Misc. Clean-up	1.5	14.8	30	_	_	900	4.4
						Tota	1 24 5

These limits define the potential emissions of the five heatset printing presses and are based on the maximum raw materials usage, the monthly-weighted average VOM content of the raw materials, 20% ink VOM retention in the paper, 50% blanket wash retention in the cleaning towels, and stack test data for the capture efficiency of coatings and adhesive. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

- 5. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in a rule which would require the Permittee to obtain a CAAPP permit from the Agency. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Agency.
- 6. Operation and emissions of the natural gas firing equipment (combined) shall not exceed the following limits:

Natural Gas Usage: 8 mmscf/mo, 72 mmscf/yr

	Emission Factor	Emissions		
Pollutant	(lb/mmscf)	(Ton/Mo)	(Ton/Yr)	
Nitrogen Oxides $(NO_x)$	100	0.4	3.6	
Carbon Monoxide (CO)	84	0.3	3.0	
Volatile Organic Materials (VOM	5.5	0.02	0.2	

These limits define the potential emissions of the fuel combustion equipment and are based on actual emissions determined from the maximum firing rate, the combustion of natural gas and standard emission factors. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

7. This permit is issued based on negligible emissions of particulate matter from waste paper collection system. For this purpose, emission shall not exceed a nominal emission rate of 0.1 lb/hour and 0.44 ton/year.

- 8. The Permittee shall maintain monthly records of the following items:
  - a. Monthly and annual usage of the inks, coatings, fountain solution and clean-up solvents (Ton/Mo, Ton/Yr).
  - b. VOM and HAP contents of the materials used (Wt.%).
  - c. Monthly-weighted average VOM content of raw materials used (wt.%).
  - d. Control device monitoring data:
    - i. A log of operating time for the control device, monitoring equipment and the associated printing lines.
    - ii. A maintenance log for the control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
  - e. VOM and HAP emission calculations (Ton/Mo, Ton/Yr).
- 9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
- 10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance and Enforcement Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or violation and efforts to reduce emissions and future occurrences.
- 11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: annual ink usage, fountain solution usage, cleaning solution usage and other VOM containing material usages for the prior year.
- 12. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Illinois EPA Division of Air Pollution Control Compliance and Enforcement Section (#40) P.O. Box 19276 Springfield, Illinois 62794-9276 
> Illinois Environmental Protection Illinois EPA Division of Air Pollution Control 9511 West Harrison Des Plaines, Illinois 60016

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E. Manager, Permit Section Division of Air Pollution Control

DES:VJB:psj

cc: IEPA, FOS Region 1
 IEPA, Compliance and Enforcement Section
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## Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from printing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario which results in maximum emissions from such a plant. This is using a maximum amount of materials as listed below. The resulting maximum emissions are below the levels (25 tons per year of VOM) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is used and control measures are more effective than required in this permit.

1. Operation and emissions of five heatset web offset lithographic printing presses (combined) shall not exceed the following limits:

		1	Ave. VOM	Capture	Control		
	Materia	l Usage	Content	Eff.	Eff.	VOM Emi	ssions
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Misc. Clean-up	1.5	14.8	30	_	-	900	4.4
						Total	24.5

These limits are based on the 20% ink VOM retention in the paper and 50% blanket wash retention in the cleaning towels.

Operation and emissions of the natural gas firing equipment (combined) shall not exceed the following limits:

Natural Gas Usage: 8 mmscf/mo, 72 mmscf/yr

	Emission Factor	Emissions		
Pollutant	(lb/mmscf)	(Ton/Mo)	(Ton/Yr)	
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or such lesser quantity as USEPA may establish in a rule which would require the Permittee to obtain a CAAPP permit from the Agency. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Agency.

4. This permit is issued based on negligible emissions of particulate matter from waste paper collection system. For this purpose, emission shall not exceed a nominal emission rate of 0.1 lb/hour and 0.44 ton/year.

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